

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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**DECLARATION OF DANIEL L. BROCKETT IN SUPPORT OF PLAINTIFFS’
MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT WITH ALL
DEFENDANTS AND PRELIMINARY CERTIFICATION OF A SETTLEMENT CLASS**

I, Daniel L. Brockett, declare under penalty of perjury as follows:

1. I am a Partner at the law firm Quinn Emanuel Urquhart & Sullivan, LLP, court-appointed Lead Counsel for the Plaintiffs in this action. I submit this declaration in support of Plaintiffs’ Motion for Preliminary Approval of Settlement With All Defendants and Preliminary Certification of a Settlement Class.

2. Exhibit 1 to this Declaration is the Settlement Agreement between Plaintiffs and Defendants Bank of America Corporation and Bank of America, N.A. Attached to Exhibit 1 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 1 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 1 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 1 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

3. Exhibit 2 is the Settlement Agreement between Plaintiffs and Defendant Barclays Bank PLC. Attached to Exhibit 2 as Exhibit A is the [Proposed] Order Preliminarily Approving

Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 2 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 2 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 2 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

4. Exhibit 3 is the Settlement Agreement between Plaintiffs and Defendant BNP Paribas. Attached to Exhibit 3 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 3 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 3 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 3 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

5. Exhibit 4 is the Settlement Agreement between Plaintiffs and Defendants Citigroup, Inc., Citibank N.A., and Citigroup Global Markets Inc. Attached to Exhibit 4 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 4 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 4 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 4 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

6. Exhibit 5 is the Settlement Agreement between Plaintiffs and Defendant Credit Suisse AG. Attached to Exhibit 5 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 5 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 5 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 5 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

7. Exhibit 6 is the Settlement Agreement between Plaintiffs and Defendant Deutsche Bank AG. Attached to Exhibit 6 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 6 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 6 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 6 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

8. Exhibit 7 is the Settlement Agreement between Plaintiffs and Defendant Goldman Sachs & Co. Attached to Exhibit 7 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 7 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 7 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 7 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

9. Exhibit 8 is the Settlement Agreement between Plaintiffs and Defendants HSBC Bank PLC and HSBC Bank USA, N.A. Attached to Exhibit 8 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 8 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 8 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 8 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

10. Exhibit 9 is the Settlement Agreement between Plaintiffs and Defendant International Swaps and Derivatives Association. Attached to Exhibit 9 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 9 as Exhibit A-1 is the Notice of Proposed Settlement of

Class Action (“Notice”). Attached to Exhibit 9 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 9 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

11. Exhibit 10 is the Settlement Agreement between Plaintiffs and Defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A. Attached to Exhibit 10 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 10 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 10 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 10 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

12. Exhibit 11 is the Settlement Agreement between Plaintiffs and Defendants Markit Group Holdings Ltd. and Markit Group Ltd. Attached to Exhibit 11 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 11 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 11 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 11 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

13. Exhibit 12 is the Settlement Agreement of Defendant Morgan Stanley & Co., LLC. Attached to Exhibit 12 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 12 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 12 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 12 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

14. Exhibit 13 is the Settlement Agreement between Plaintiffs and Defendants Royal Bank of Scotland PLC and Royal Bank of Scotland N.V. Attached to Exhibit 13 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the

Settlement Class. Attached to Exhibit 13 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 13 as Exhibit A-2 is the Summary Notice.

Attached to Exhibit 13 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

15. Exhibit 14 is the Settlement Agreement Plaintiffs and Defendants UBS AG and UBS Securities LLC. Attached to Exhibit 14 as Exhibit A is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class. Attached to Exhibit 14 as Exhibit A-1 is the Notice of Proposed Settlement of Class Action (“Notice”). Attached to Exhibit 14 as Exhibit A-2 is the Summary Notice. Attached to Exhibit 14 as Exhibit B is the [Proposed] Final Judgment and Order of Dismissal.

16. Exhibit 15 to this Declaration is the [Proposed] Order Preliminarily Approving Settlements and Providing for Notice to the Settlement Class.

17. Exhibit 16 is the Notice of Proposed Settlement of Class Action (“Notice”).

18. Exhibit 17 is the Summary Notice.

19. Exhibit 18 is the firm resume of the Claims Administrator chosen for this matter, The Garden City Group.

20. Exhibit 19 is the firm resume of Signature Bank, which has been selected as the Escrow Agent.

21. Exhibit 20 is the [Proposed] Final Judgment and Order of Dismissal.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 16th day of October of 2015.

A handwritten signature in black ink, reading "Dan Brockett". The signature is written in a cursive style with a large initial "D" and "B".

Daniel L. Brockett